

# EXHIBIT

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**UNITED STATES DEPARTMENT OF JUSTICE**  
**TIMOTHY J. DOWNING**  
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January 11, 2021

Jimmy Xu  
 Norton Rose Fulbright US LLP  
 1301 Avenue of the Americas  
 New York, New York 10019-6022

RE: *United States v. Shaorong Liu*, No. 20-234 (W.D. Okla.)

Dear Mr. Xu:

Enclosed is a hard drive containing several folders of discovery for the above-referenced case. The following folders contain native images, text and load files as described in the following table:

FBI Number	Folder Name	Description	Begin Bates	End Bates
Various	DVD RW Reading	Previously produced documents	LIU_0000000001	LIU_000028624
	OCC800099 My Passport WD	Liu OU Emails	LIU_000028625	LIU_000207889
1B112	OCC300111 Logical MacBook A1297	Apple MacBook A1297	LIU_300111_0000000001	LIU_300111_000231975
1B166	OCC300122 Desktop with Thermaltake case	Desktop computer with Thermaltake case	LIU_300122_0000000001	LIU_300122_000150276
1B166	OCC300123 Desktop with Thermaltake case	Desktop computer with Thermaltake case	LIU_300123_0000000001	LIU_300123_000125720
1B78	OCC800213 Lenovo Thinkpad	Lenovo Thinkpad	LIU_800213_0000000001	LIU_800213_000410771
Various	LIU Scanned Documents	Scanned images of select hard copy documents	SW_0000000001	SW_000016925

The folders named "Photo Disk 1" and "Photo Disk 2" contain pictures of devices seized by investigators. I direct you to files named "Digital Items List Disk 1.xlsx" and "Digital Items List Disk 2.xlsx" in the respective Photo Disk folders, which contain an index and a description of devices.

The remaining folders in the hard drive are labeled by Unique Identifier numbers beginning “OCC” contain digital images of various devices. You may use the Unique Identifier number and the Digital Items List to determine from which device images were made.

In particular, the images produced on this hard drive have device identifier numbers: OCC300105, OCC300107, OCC300109, OCC300111, OCC300122, OCC300123, OCC300149, OCC300150, OCC300152, OCC400156, OCC300160, OCC300174, OCC300175, OCC300176, OCC300177, OCC300178, OCC300179, OCC300180, OCC300181, OCC300185, OCC800213, OCC800215, OCC800216, OCC800217, OCC800276, OCC800280, OCC800282, OCC800283, OCC800286, OCC800289, OCC800302, OCC800303, OCC800304, OCC800305, OCC800306, OCC800307, OCC800308, OCC800309.

Should you need assistance accessing digital images of devices, we are prepared to assist you.

We have another group of device images which we hope to be able to provide you shortly.

Please do not hesitate to let me know if you have any questions. Thank you for your attention to this matter.

Sincerely yours,

TIMOTHY J. DOWNING  
United States Attorney

s/ William E. Farrior

WILLIAM FARRIOR  
Assistant U.S. Attorney

Enclosure: WD Elements Hard Drive

CC (via email): Carlos Ortiz, Mayling Blanco, Lacey Stephenson, Bob Wyatt, William Lawler, Shawn Wright, Jane Thomas



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January 14, 2021

Jimmy Xu  
Norton Rose Fulbright US LLP  
1301 Avenue of the Americas  
New York, New York 10019-6022

RE: *United States v, Shaorong Liu*, No,20-234 (W.D, Okla.)

Dear Mr. Xu:

Enclosed is a hard drive containing several folders of discovery for the above-referenced case.

The United States previously produced folders named “Photo Disk 1” and “Photo Disk 2” contain pictures of devices seized by investigators. I direct you to files named “Digital Items List Disk 1.xlsx” and “Digital Items List Disk 2.xlsx” in the respective Photo Disk folders, which contain an index and a description of devices.

The folders in the hard drive are labeled by Unique Identifier numbers beginning “OCC” contain digital images of various devices. You may use the Unique Identifier number and the Digital Items List to determine from which device images were made.

The images produced on this hard drive have device identifier numbers: OCC300125, OCC300151, OCC300153, OCC300158, OCC300159, OCC300172, OCC300173, OCC300187, OCC300188, OCC300190, OCC300192, OCC300195, OCC300196, OCC300199, OCC300200, OCC300204, OCC300205, OCC300206, OCC300207, OCC300208, OCC300210, OCC300211, OCC300213, OCC300216, OCC300220, OCC300222, OCC300224, OCC300226, OCC300228, OCC300229, OCC300230, OCC300231, OCC300234, OCC300236, OCC300238, OCC300239, OCC300240, OCC300241, OCC300242, OCC300243, OCC300244, OCC300245, OCC300246, OCC300247, OCC300248, OCC300249, OCC300250, OCC300251, OCC300252, OCC300253, OCC300254, OCC300255, OCC300256, OCC300257, OCC300258, OCC300259, OCC300260, OCC300261, OCC300262, OCC300263, OCC300264, OCC300265, OCC300266, OCC300267, OCC300268, OCC300269,

OCC300270, OCC300271, OCC300272, OCC300273, OCC300275, OCC800217\_logical, OCC800277, OCC800278, OCC800279, OCC800281, OCC800285, OCC800288, OCC800291, OCC800292 - SIM for 800291, OCC800297, OCC800299, OCC800301, OCC800311, OCC800312, OCC800313, OCC800314, OCC800315, OCC800316, OCC800317, OCC800318, OCC800319, OCC800320, OCC800321, OCC800322, OCC800323, OCC800324, OCC800325, OCC800326, OCC800327, OCC800328, OCC800329, OCC800330, OCC800331, OCC800332, OCC800334, OCC800335, OCC800336, OCC800337, OCC800338, OCC800339, OCC800340, OCC800342, OCC800343, OCC800344, OCC800345, OCC800346, OCC800350, OCC800351, OCC800352, OCC800353, OCC800354, OCC800355, OCC800356, OCC800358, OCC800361, OCC800362, OCC800363 - SIM for 800362, OCC800364, OCC800366, OCC800367.

Should you need assistance accessing digital images of devices, we are prepared to assist you.

Please do not hesitate to let me know if you have any questions. Thank you for your attention to this matter.

Sincerely yours,

TIMOTHY J. DOWNING  
United States Attorney

s/ William E. Farrior

WILLIAM FARRIOR  
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